

Compliance Monitoring Inspection Checklist  
For  
Transporters

South Carolina Department of  
Health and Environmental Control

Bureau of Land and Waste Management  
Division of Compliance and Enforcement

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SOUTH CAROLINA HAZARDOUS WASTE COMPLIANCE  
INSPECTION CHECKLIST  
TRANSPORTERS AND MISCELLANEOUS

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The purpose of this inspection is to determine compliance with the South Carolina Hazardous Waste Management Regulations promulgated pursuant to Section 44-56-10 et seq. of the 1976 South Carolina Code of Laws, as amended.

Facility: \_\_\_\_\_ Date: \_\_\_\_\_

EPA ID Number: \_\_\_\_\_ Inspector: \_\_\_\_\_

TRANSPORTERS CHECKLIST

Subpart A - General (TGR)

- 270.1 and 263.10(d) Does transporter hold a current state permit to transport hazardous waste? \_\_\_\_\_
- 263.11(a) Does the transporter have an EPA ID Number? \_\_\_\_\_
- 263.14 Does transporter have adequate financial responsibility for sudden and accidental occurrences? (consult central office personnel for determination prior to inspection.) \_\_\_\_\_
- 263.10(c)(1) Has transporter hauled hazardous waste into the United States from abroad? \_\_\_\_\_
- If yes, complete Generator checklist.
- Does transporter remove hazardous waste from the transport vehicle for the purpose of blending, mixing, treating or storing? \_\_\_\_\_
- 263.23(a) If so, is this performed at a facility in the State having a permit under R.61-79.270? \_\_\_\_\_
- Does transporter mix hazardous waste from different generators or separate wastes from the same generator? \_\_\_\_\_
- 263.23(b) If yes, has the transporter obtained written permission from the Department and complied with the generator standards? \_\_\_\_\_
- 263.23(b) Or, has he demonstrated that the manifest still identifies the hazardous waste? \_\_\_\_\_
- 263.10(e) Does transporter ensure that all equipment is leakproof & properly secured prior to its use for transporting hazardous waste? \_\_\_\_\_
- 263.10(f) Has transporter ensured that all personnel have completed a training program that is acceptable to the Bureau of Solid and Hazardous Waste Management? \_\_\_\_\_
- 263.12 Does transporter store manifested shipments of hazardous waste at a transfer facility for a period of greater than ten (10) days? \_\_\_\_\_
- If yes, transporter must have interim status. Complete Interim Status checklist.

Note: The following questions apply to transporters shipping waste from small quantity generators under a batch tolling

agreement.

- 263.20(h)(1) Is the SQG waste being transported pursuant to a reclamation agreement as provided for in 262.20(e)? \_\_\_\_\_
- 263.20(h)(2) Does the transporter record on a log or shipping the following information for each shipment:
- 263.20(h)(2)(i) Name, address and US EPA Identification number of the generator of the waste? \_\_\_\_\_
- 263.20(h)(2)(ii) The quantity of the waste accepted? \_\_\_\_\_
- 263.20(h)(2)(iii) All DOT required shipping information? \_\_\_\_\_
- 263.20(h)(2)(iv) The date the waste is accepted? \_\_\_\_\_
- 263.20(h)(3) Does the transporter carry this record when transporting waste to the reclamation facility? \_\_\_\_\_
- 263.20(h)(4) Does the transporter retain these records for at least three years after termination or expiration of the agreement? \_\_\_\_\_

Subpart B - Manifests and Record Keeping (TMR)

- 263.22(a-c) Does transporter ship HW using the HW manifest (or EPA acknowledgement of consent in regard to Primary Exporters where appropriate)? \_\_\_\_\_
- 263.22(a) Does transporter maintain manifests on file for a period of three years? \_\_\_\_\_
- 263.20(a) Do manifests include completed information on the following:
- Manifest document number? \_\_\_\_\_
- Generator name, mailing address, telephone #? \_\_\_\_\_
- Generator EPA ID number? \_\_\_\_\_
- Transporter(s) name & EPA ID #? \_\_\_\_\_

Facility name, address & EPA ID #? \_\_\_\_\_

Alternate facility name, address & EPA ID # (if applicable)? \_\_\_\_\_

Waste information required by DOT shipping name, quantity (weight or volume), containers (type and number)? \_\_\_\_\_

EPA waste code number? \_\_\_\_\_

Emergency information: special handling instructions, emergency phone #'s (optional)? \_\_\_\_\_

Is the following certification on each manifest form? \_\_\_\_\_

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of DOT, SCPSC, and SCDHEC.

Does transporter haul bulk shipments by water? \_\_\_\_\_

263.20(e) If yes, does the transporter have shipping papers with all information required on the manifest except EPA ID #, generator certification, and signatures? \_\_\_\_\_

Does transporter ship waste by rail? \_\_\_\_\_

263.22(c)(1) If yes and he is initial rail transporter, does he have all shipping papers and manifests with all manifest information except the EPA ID #, generation certification, & signatures? \_\_\_\_\_

263.22(c)(2) If yes and he is the final rail transporter, does he have either signed shipping papers or manifests with all required information except the EPA ID # & generator certification? \_\_\_\_\_

Discharge (TWD)

	Has transporter ever had a spill of hazardous waste during transportation?	_____
263.30	If yes, were proper notification made?	_____
263.31	Were any spilled hazardous wastes cleaned up properly to ensure that they no longer present a threat to human health and environment?	_____

RECYCLERS CHECKLIST  
261.6 Requirements for Recyclable Materials

261.1           Applicability:

- 261.1(c) (7)   A material is 'recycled' if it is used, reused or reclaimed.
- 261.1(c) (4)   A material is 'reclaimed' if it is processed to recover a usable product or it is regenerated.  
Ex. Regeneration of spent solvents.
- 261.1(c) (5)   A material is 'used or reused' if it is employed as an ingredient or as a substitute for a commercial product.

Is the material in question being recycled?   \_\_\_\_\_

    If yes, proceed with this checklist.

261.6           Exclusions:

- 261.6(a) (3)   The following materials (1-7) which are being recycled are not subject to Regulation and should not be used in a Hazardous Waste quantity determination.
- i.     Industrial Ethyl Alcohol
  - ii.    Used batteries/cells returned to a battery manufacturer
  - iii.   Used oil under certain conditions
  - iv.    Scrap metal
  - v.     Fuels produced from the refining of oil bearing Hazardous Waste at a petroleum refining facility
  - vi.    Oils reclaimed from Hazardous Waste at a petroleum refining facility
  - vii.   Hazardous waste fuel from oil bearing hazardous waste from petroleum refining
  - viii.  Petroleum coke produced from petroleum refinery of hazardous wastes under certain conditions

- 261.6(a) (2)   Note: The following recyclable materials (8-11) are regulated under 266. and require completion of the indicated checklist. (Note: all should be used in a HW quantity determination except for \*).
- i.     Recyclable materials used in a manner constituting disposal. (Complete the 'Land Disposal' portion of ISS Checklist).
  - ii.    Hazardous waste burned for energy recovery in boilers and industrial furnaces not regulated under 265 or 264. (Complete the Hazardous Waste Fuels Checklist).
  - iii.   Used oil that is recycled and is also a hazardous waste solely because it exhibits a hazardous characteristic. (Complete the appropriate Used Oil Checklist.)
  - iv.    Recyclable materials from which precious metals are reclaimed. (Complete the Precious

Metals Recovery' Checklist)

- v. Spent lead-acid batteries that are being reclaimed. (Complete the 'Battery Reclamation' portion of this Checklist).

Does the material in question appear in the \_\_\_\_\_  
above list of exempt materials?

If 'yes' indicate exempt material: \_\_\_\_\_

If 'no' proceed with this checklist.

Give a brief description of material and re-  
cycling process:

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Is the material being reclaimed or reused? (circle one)  
(Go to Section A or B)

A. Reclamation

Identify the material being reclaimed: (Table 1, 261.2)

1. A 'characteristic' sludge (e.g not \_\_\_\_\_  
listed)
2. A 'characteristic' by-product (e.g \_\_\_\_\_  
not listed; process residues which are  
the result from the production of a  
primary product; e.g. slags or distillation  
column bottoms)
3. A commercial chemical product ('p' \_\_\_\_\_  
or 'u' listed in Section 261.33)
4. A 'listed or characteristic' spent \_\_\_\_\_  
material (e.g. one which cannot serve its  
original intended purpose without processing;  
ex. listed or characteristic solvents, etc.)
5. A 'listed' sludge (listed in \_\_\_\_\_  
Sections 261.31 or 32)
6. A 'listed' by product (process \_\_\_\_\_  
residues which result from the pro-  
duction of a primary product; e.g.  
slags or distillation bottoms; listed  
in 261.31 or 32)

If 'yes' to [A(1) or A(2)] above then  
indicate how material is being used:

1. Use constituting disposal? (applied \_\_\_\_\_  
to or placed on the land)
2. Use to produce a fuel, as a component \_\_\_\_\_  
of a fuel or burned to recover energy?
3. Speculatively accumulated? ('specu- \_\_\_\_\_  
lative accumulation' is the accumulation  
of a material before being recycled.  
When less than 75% by weight or volume  
of the amount of material accumulated  
at the beginning of the period is recycled



or transferred to a different site for recycling).

If 'yes' to any of the above 3 questions the material is subject to Regulation even though the actual 'treatment' process is exempt treatment. Material should be used in HW determination.

If 'yes' in regard to 'speculative accumulation' then;

Does handler have an active variance from the Department to accumulate speculatively? \_\_\_\_\_

261.2(a)(4) If 'no' in regard to 'speculative accumulation' then does the handler have the following:

Documentation to support claims that he is not accumulating speculatively (i.e. not regulated)? \_\_\_\_\_

1. Labels on containers indicating type of material and date of initial accumulation? \_\_\_\_\_

2. Operating records showing the volume of said materials? \_\_\_\_\_

3. Records showing the amount of said materials generated or received during the calendar year? \_\_\_\_\_

4. Records showing the amount of said materials remaining at the end of the calendar year? \_\_\_\_\_

If 'yes' to A(3) above then;  
Indicate how material is being used:  
Use constituting disposal? (applied to or placed on the land) \_\_\_\_\_

Used to produce a fuel, as a component of a fuel or burned to recover energy? \_\_\_\_\_

If 'yes' to any of the above the material is subject to Regulation even though the actual 'treatment' process is exempt. Material should be used in HW determination.

261.6(a)(1) If yes to A4, A5, or A6 above then; The material is subject to Regulation and should be used in a HW quantity determination even though the actual recycling process is exempt from being viewed as 'Treatment'.

Is the material being properly handled? \_\_\_\_\_

If 'no' complete the 'Release of HW/Spillage' Checklist.

Is the material being stored on-site before the actual recycling process begins? \_\_\_\_\_

261.6(b) If 'yes' and storage is less than 90 days, complete the generator checklist. (Note: all applicable requirements of Section 262., e.g. manifesting, notification, etc)

Is the material being transported and being stored less than 10 days by the transporter? \_\_\_\_\_

If 'yes' complete the Transporter Checklist.

Is the material being stored greater than 90 days? \_\_\_\_\_

261.6(c) (1) If 'yes' complete the applicable ISS or permitted Facility Standards Checklist (Note: do not include the recycling process as treatment)

261.6(c) (2) Facilities who recycle materials without storing are subject to Notification and Manifesting requirements.

B. Reuse:

Identify the material being reused and the process:

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Does the material meet any of the following descriptions:

1. Used or reused as ingredients in an industrial process to make a product provided the materials are not being reclaimed or land disposed? \_\_\_\_\_
2. Used or reused as effective substitute for commercial products? \_\_\_\_\_
3. Returned to the original process from which they are generated, without first being reclaimed or land disposed? \_\_\_\_\_

If 'yes' to any of the above (1-3), then:

- a) Is the material being used in a manner constituting disposal or used to produce products that are applied to the land? \_\_\_\_\_
- b) Is the material burned for energy recovery, used to produce fuel or contained in fuels? \_\_\_\_\_
- c) Is the material listed as F020, F021, F022, F023, F026 or F028 (unless used as an ingredient to make a product)? \_\_\_\_\_
- d) Is the material accumulated speculatively? (Speculative accumulation is the accumulation of a material before being recycled when less than 75% by weight or volume of the amount of material accumulated during a calendar year is recycled or transferred to a different site for recycling). \_\_\_\_\_

If 'yes' to any of the above (a-d) the material is a solid waste.

Is the material hazardous by listing or characteristic? \_\_\_\_\_

If 'yes' the material is regulated and all other appropriate checklists should be

completed. (Note: the material should be used in the HW quantity determination).

If 'yes' in regard to 'speculative accumulation' then;

Does handler have an active variance from the Department to accumulate speculatively? \_\_\_\_\_

261.2(a)(4) If 'no' in regard to 'speculative accumulation' then does the handler have the following documentation to support claims that he is not accumulating speculatively (i.e. not regulated)?

1. Labels on containers indicating type of material and date of initial accumulation? \_\_\_\_\_
2. Operating records showing the volume of said materials? \_\_\_\_\_
3. Records showing the amount of said materials generated or received during the calendar year? \_\_\_\_\_
4. Records showing the amount of said materials remaining at the end of the calendar year? \_\_\_\_\_

Subpart C - Recyclable Materials Used in a Manner Constituting Disposal Checklist  
(GOR or DOR)

Applicability:

266.20 Are recyclable materials being applied to \_\_\_\_\_  
or placed on the land?

If so, proceed.

Exclusions:

266.20 (b) Are the recyclable materials contained in \_\_\_\_\_  
a commercial fertilizer for the general  
public's use?

If 'yes', this activity is not presently  
subjected to regulation provided the material meets  
treatment standards and prohibition standards.

If 'no', proceed.

Describe the materials used and the process:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Are recyclable materials being mixed \_\_\_\_\_  
chemically with any other substances  
which render them physically inseparable?

Does industry have information (sampling \_\_\_\_\_  
analysis, TCLP, etc) to support the  
above?

266.20 (b) If 'yes' to both of the above, the resulting product  
is not subject to regulation.

If 'no' the resulting product and the  
recyclable material to be used is subject  
to certain regulations.

If 'no' complete the following:

Is the recyclable material to be used in \_\_\_\_\_  
a manner constituting disposal stored  
90 days before use?

If 'yes' (complete ISS/Permitted Facility  
Standards for the facility who is storing,  
even if he is not the ultimate user).

Is the final product being transported? \_\_\_\_\_

If 'yes' (complete the transporter check-  
list).

Is the final product being left in or on \_\_\_\_\_  
the land?

If 'yes' (complete the ISS/Permitted Facility  
Standards Checklist).

266.23 (b) Is waste oil or other material contaminated \_\_\_\_\_  
with dioxin or other hazardous waste (other  
than a waste identified solely on the basis  
of ignitability) being applied for the

purpose of dust suppression or road treatment?

Pol.Con.Act    Is waste oil being applied to the land for the purpose of dust suppression? \_\_\_\_\_

Subpart E - Used Oil Burned for Energy Recovery 266 (GOR or DOR)

Applicability:

266.40    Used oil burned for energy recovery in a boiler or industrial furnace not regulated under Subpart O of 264 or 265 are termed "used oil fuels".

Exclusions:

266.40    Does handler qualify for any of the following exclusions: (Indicate)

266.40(c)    Has used oil been mixed with a hazardous waste and/or contain 1000 ppm halogenated or chlorinated solvents? (If yes use Hazardous Waste Burned for Energy Recovery Checklist). \_\_\_\_\_

266.40(d)    Is used oil produced by a conditionally exempt small quantity generator? (If yes, this \_\_\_\_\_

completes this checklist).

- 266.40(e) Does used oil exceed any of the following specification levels?

<u>Constituent/Property</u>	<u>Allowable Level</u>	
Arsenic	5 ppm max	_____
Cadmium	2 ppm max	_____
Chromium	10 ppm max	_____
Lead	100 ppm max	_____
Flash Point	100 F min.	_____
Total Halogens	4,000 ppm max	_____

Note: If all answers are "No" see only 266.43(b)(1) and (6). If any answers to this section are "Yes" then used fuel oil is termed "off-specification used fuel oil" and continue with full checklist.

Does handler market off-spec used oil for energy recovery to:

- 266.41  
(a)(1)(2) Burners and other marketers who have notified the Department of this activity and have an EPA ID number? \_\_\_\_\_
- 266.41  
(b)(1) Burners with industrial furnaces identified in 260.10? \_\_\_\_\_
- 266.41  
(b)(2)(i) Industrial boilers, as defined in 260.10, located on receiving facility that engages in manufacturing new products or components of new products? \_\_\_\_\_
- 266.41  
(b)(2)(ii) Utility boilers used to make steam, electric power, or cooled air, or other gases or fluids for sale? \_\_\_\_\_
- 266.41  
(b)(2)(iii)  
(a-c) Owners or operators of less than 0.5 million BTU/hour space heaters, vented to the ambient air that burn only oil that the operator generates or receives from do-it-yourself oil changers? \_\_\_\_\_
- If the generator markets used oil directly to a burner see Section 266.43 of this checklist. If the generator is a burner see 266.44.

Marketers of Used Oil

- 266.43  
(b)(1) Does Marketer have analysis documenting this used oil meets all specifications of 266.40(e)? (If "no" then go back to 266.40(c) above and complete checklist). \_\_\_\_\_
- 266.43  
(b)(3) Has marketer notified the Department of his off-spec used oil management activities? \_\_\_\_\_
- 266.43  
(b)(4)(i-vi) Is marketer preparing and sending invoices for each shipment of off-spec used oil? \_\_\_\_\_
- Does the invoice include:
- An invoice number? \_\_\_\_\_
- Marketer's EPA ID number, company name and address? \_\_\_\_\_

Receiving facility's EPA ID number, \_\_\_\_\_  
company name and address?

Quantity of off-spec oil delivered? \_\_\_\_\_

Date off-spec oil delivered? \_\_\_\_\_

Does the invoice contain the \_\_\_\_\_  
following statement?

"This used oil is subject to South Carolina  
Hazardous Waste Management Regulations under  
R. 61-79.266".

266.43  
(b) (5) (i) Before initiation of first shipment, has \_\_\_\_\_  
marketer obtained a written and signed  
notice from receiving burner or marketer  
stating:

- a) Receiving marketer or burner has notified  
Department of his used oil management  
activities and;
- b) If receipt is a burner, the industrial  
furnace or boiler will operate as  
prescribed in 266.41(b)?

266.43 (iii) Before initiation of first shipment has \_\_\_\_\_  
receiving marketer certified in writing  
to the shipping marketer that he has  
notified the Department of his used oil  
management activities?

266.43  
(b) (6) (i) Marketers making the first claim that  
their used oil meets the specifications  
of 266.40(e) must keep copies of  
supportive analyses [maintained in  
266.43 (b)(1)] for at least three (3)  
years. The following record keeping is  
also necessary for on-spec used oil  
management activities.

With each shipment a record of:

The name and address of recipient? \_\_\_\_\_

Quantity of used oil fuel delivered? \_\_\_\_\_

Date of shipment or delivery? \_\_\_\_\_

Cross reference to the record of  
analyses? \_\_\_\_\_

266.43 (ii) For off-spec used oil fuel has the  
marketer: \_\_\_\_\_  
  
Maintained a copy of each invoice for  
at least three (3) years from the date  
of shipment? \_\_\_\_\_

Maintained a copy of each certification  
notice for at least three (3) years,  
after his last transaction, from each  
respective marketer? \_\_\_\_\_

#### Burners of Used Oil

266.44 (b) Has burner notified the Department of his \_\_\_\_\_  
used oil management activities, including  
location of facility?

(Note: Burners in category 266.41(b)(2) are exempt)

266.44(c) For off-spec used oil fuel, has the burner supplied notices (prior to shipments by his marketers) stating:

(1) He has notified the Department of his location and description of his used oil management activities? \_\_\_\_\_

(2) He will burn the used oil only in a furnace or boiler that is in accordance with 266.41(b)? \_\_\_\_\_

266.44(d)(1) Does the burner claim that the used oil he receives meets the specifications provided in 266.40(e)? \_\_\_\_\_

If "no" does the burner have documentation of analysis supporting this claim? \_\_\_\_\_

266.44(2) Does burner treat his off-spec oil to meet 266.40 (e) specifications? \_\_\_\_\_

If "yes" is analysis documentation available that supports his claim? \_\_\_\_\_

266.44(e) Has the burner maintained on file for three (3) years:

Invoices of transactions? \_\_\_\_\_

Analyses (as may be required by paragraph "d" above)? \_\_\_\_\_

Certification notices that he sent to his marketers/customers? \_\_\_\_\_



Subpart F - Precious Metal Recovery (GOR or DOR)

- 266.70 (a)      Applicability:
- Recyclable materials reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, irridium, osmium, rhodium, ruthenium, or any combination of these.
- 266.70 (b)      Are any of the following activities pursued (with respect to recyclable materials utilized for precious metal recovery):
- Generation? \_\_\_\_\_
- Transportation? \_\_\_\_\_
- Storage? \_\_\_\_\_
- 266.70 (b) (1)    Has proper notification of any of the above activities been submitted to the Department? \_\_\_\_\_
- (Note:    see Sections 262.13, 263.13, 264.5 and/or 265.5 of the Regulations)
- Are manifests being maintained in accordance with all applicable Regulations regarding generators, transporters, and storers? \_\_\_\_\_
- 266.70 (c)      Are the following records being maintained regarding recyclable materials regulated under Subpart F:
- (1)    records showing the volume of those materials stored at the beginning of each calendar year? \_\_\_\_\_
- (2)    The amount of these materials generated or received during each calendar year? \_\_\_\_\_
- (3)    The amount of materials remaining at the end of each calendar year? \_\_\_\_\_
- 266.70 (d)      (Note:    The above questions are used to determine whether or not the materials are being accumulated speculatively. If the materials are being accumulated speculatively, then they are subject to all applicable provisions of R.61-79.262 thru 265,270, and 124 of the Regulations - please see Speculative Accumulation citations in Recyclers Checklist).

Subpart G - Spent Lead-acid Batteries Being Reclaimed (GOR or DOR)

- 266.80            Applicability:
- These requirements apply to persons who handle

or reclaim (including regeneration) spent lead-acid batteries.

Is handler treating or cracking batteries? \_\_\_\_\_

266.80(b)(1) If yes, has handler notified the Department of \_\_\_\_\_  
this activity?

If yes, Handler is subject to ISS for treatment of HW, complete all applicable portions of the checklist.

Is reclaimer storing batteries from off-site \_\_\_\_\_  
before reclamation?

Describe: \_\_\_\_\_

266.80(b)(2) If yes, has handler notified the Department \_\_\_\_\_  
of this activity?

Complete checklist for General Facility Standards (excepting waste analysis), Preparedness and Prevention, Contingency Plan, General Reporting Requirements (excepting manifest and manifest discrepancies), Ground-water monitoring (if applicable), closure/post-closure.

In regard to batteries or battery acid or lead plates which are HW:

Does handler store in container? \_\_\_\_\_

If yes, complete use and management of containers section of ISS checklist.

Does handler treat or store in tanks? \_\_\_\_\_

If yes, complete 'Tanks' section of ISS checklist.

Does handler treat or store in surface impoundments or waste piles? \_\_\_\_\_

If yes, complete applicable section of ISS checklist.

Y = Yes  
N = No  
C = Concern  
N/A = Not Applicable